

RCRA, SUPERFUND & EPCRA HOTLINE MONTHLY REPORT
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2. Contents of Closure Plan

Sections 264.112(b) and 265.112(b) of the RCRA regulations require the owner and operator of a treatment, storage, and disposal facility (TSDF) to complete a written closure plan that identifies steps necessary to perform partial and/or final closure of the facility at any point during its active life. The closure plan must include an estimate of the maximum inventory of hazardous wastes ever on site over the active life of the facility and a detailed description of the methods that would be employed during partial closures and final closure (Sections 264/265.112(b)(3)). Is the owner and operator required to address wastes that are treated or accumulated in ninety-day generator accumulation units in the closure plan as part of the maximum inventory?

Facility owners and operators are required to include wastes that are treated or accumulated in ninety-day generator units in estimations of the maximum inventory of hazardous wastes ever on site over the active life of the facility for purposes of the closure plan. EPA promulgated requirements for more detailed closure plans in response to concerns that poorly detailed plans were accompanied by inadequate cost estimates. The purpose of increased detail in the closure plan is to ensure that a third party could conduct closure in accordance with the plan if the owner and operator fails to do so, as well as to ensure accurate cost estimates for closure (51 FR 16426; May 2, 1986). Consequently, EPA intended for the maximum inventory of wastes on site during the active life of the facility to include hazardous wastes accumulated in generator accumulation units as well as permitted units.